

REMARKS

The Office Action mailed November 18, 2003 has been carefully reviewed and the following remarks are made in consequence thereof.

Claims 1-20 are pending in this application. Claims 1-20 stand rejected.

Applicant respectfully traverses the requirement in the Office Action to furnish additional drawings. Applicants submit that the specification in light of the figures that were already submitted was sufficient to meet the requirements of 37 CFR 1.81. However, to expedite prosecution, Applicant herewith submits replacement drawing sheets as required in the Office Action. The figures illustrate that was already been disclosed in the originally filed specification. No new matter has been added. Upon approval of the drawings, Applicants will submit formal drawings incorporating the above-noted changes.

The rejection of Claims 1-20 under 35 U.S.C. § 101 as being directed to non-statutory subject matter is respectfully traversed.

Claim 1 has been amended to add a physical step and post-solution activity. Accordingly, Claim 1 is submitted to satisfy the requirements of Section 101.

Claims 2-6 depend from independent Claim 1. When the recitations of Claims 2-6 are considered in combination with the recitations of Claim 1, dependent Claims 2-6 are submitted to satisfy the requirements of Section 101.

Claim 7 has been amended to add a physical step and post-solution activity. Accordingly, Claim 7 is submitted to satisfy the requirements of Section 101.

Claims 8-13 depend from independent Claim 7. When the recitations of Claims 8-13 are considered in combination with the recitations of Claim 7, dependent Claims 8-13 are submitted to satisfy the requirements of Section 101.

Claim 14 has been amended to add a physical step and post-solution activity. Accordingly, Claim 14 is submitted to satisfy the requirements of Section 101.

Claims 15-20 depend from independent Claim 14. When the recitations of Claims 15-20 are considered in combination with the recitations of Claim 14, dependent Claims 15-20 are submitted to satisfy the requirements of Section 101.

For at least the reasons set forth above, Applicants respectfully request that the Section 101 rejection of Claims 1-20 be withdrawn.

The rejection of Claims 1-20 under 35 U.S.C. § 112, first paragraph, is respectfully traversed.

Applicant respectfully submits that one of ordinary skill in the art, after reading the specification in view of the Figures, would agree that the subject matter in the specification is described in such a manner as to reasonably convey that the Applicant had possession of the claimed invention, at the time the application was filed.

Applicant respectfully submits that given the newly added Figures 4-7 and the respective specification description amendments, one of ordinary skill in the art, after reading the specification in view of the Figures, would agree that the subject matter in the specification is described in such a manner as to reasonably convey that the Applicant had possession of the claimed invention, at the time the application was filed. Accordingly, Applicant submits that Claim 1 satisfies the requirements of Section 112, first paragraph.

Claims 2-6 depend from independent Claim 1, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 1.

Independent Claim 7 also includes the terms “single equivalent profile curve” and “revolved face.” Applicant respectfully submits that given the new Figures 4-7 and the respective specification description amendments, one of ordinary skill in the art, after reading the specification in view of the Figures, would agree that the subject matter in the specification is described in such a manner as to reasonably convey that the Applicant had possession of the claimed invention, at the time the application was filed. Accordingly, Applicant submits that Claim 7 satisfies the requirements of Section 112, first paragraph.

Claims 8-13 depend from independent Claim 7, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 7.

Furthermore, Applicant submits that the specification as originally filed, does adequately describe a server system configured to be coupled to a client system and a data storage device wherein the server system is further configured to generate a single equivalent curve for each revolved face of a three-dimensional solid in a two-dimensional plane. More specifically, Applicant submits that one skilled in the art, after reading the specification in light of the Figures would understand that a server system configured to be coupled to a client system may operate in a in a client-server environment that is not limited to the definition provided in the Office Action, but rather a server system may provide significantly greater resources than recited in the Office Action. Furthermore, Applicant submits that a definition for “server” may not necessarily apply to a “server system” as claimed in the present specification. Similarly, applicant submits that a definition of “configuration” may have little or nothing to do with a definition of “configured to” as recited in the Claims of the instant specification. A computer that is “configured to” perform a step of a process may be very much part of the entire interconnected set of hardware. As such, Applicant respectfully submits that using definitions of words other than those used in the Claims has lead to a misunderstanding of what is claimed. Although the Microsoft Computer Dictionary may be a reasonable starting point for ascertaining the plain meaning of terms as asserted in the Office Action. Applicant submits that the investigation of what the plain meaning of a term is can not just stop there, especially when the terms of interest are not defined in the Microsoft Computer Dictionary, and especially when the definition of substitute terms that are deemed, in the Office Action, to be close enough to the terms of interest, render the present invention inoperable. Applicants respectfully submit that the Microsoft Computer Dictionary is not a resource that one skilled in the art would limit themselves to for ascertaining the definitions of “server system” and “configured to.”

The Federal Circuit has opined in *Verve LLC v. Crane Cams, Inc.*, 65 USPQ 2d 1051, 1053-1054 (Fed. Cir. 2002), that “[p]atent documents are written for persons familiar with the relevant field; the patentee is not required to include in the specification information readily understood by practitioners, lest every patent be written as a comprehensive tutorial and treatise for the generalist, instead of a concise statement for persons in the field.” In the

present case, Applicant respectfully submits that the specification is complete and that one skilled in the art would understand that a server system may include application software that it executes in a client-server configuration.

Applicant submits that one of ordinary skill in the art would understand that a system for creating a two-dimensional representation of a three-dimensional solid, including a client system having a browser, a data storage device for storing information relevant to a plurality of users, and a server system configured to be coupled to the client system and the data storage device may be configured such that the server system may generate a single equivalent curve for each revolved face of the three-dimensional solid in a two-dimensional plane. Moreover, “resolution of any ambiguity may be aided by extrinsic evidence of usage and meaning of a term in the context of the invention” such that the determining factor regarding the meaning of a term, is “how the phrase would be understood by persons experienced in the field...upon reading the patent documents.” As such, Applicant respectfully submits that an artisan of ordinary skill in the art would not limit their understanding of “server system” and “configured to” to the definitions given in the Microsoft Computer Dictionary and would recognize that the server system, in the context of the present invention, may be configured to not only execute administrative software that controls access to the network and its resources, but may also be configured to provide resources to computers, such as, execute application software on the server processor.

However, in order to expedite prosecution of the present application, Applicant has amended Claims 14-20 to remove reference to “configured to”. Accordingly, Applicant submits that Claim 14 satisfies the requirements of Section 112, first paragraph.

Claims 15-20 depend from independent Claim 14, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 14.

For at least the reasons set forth above, Applicant respectfully requests that the Section 112, first paragraph, rejection of Claims 1-20 be withdrawn.

The rejection of Claims 1-20 under 35U.S.C. §112, first paragraph, is respectfully traversed.

Applicant respectfully submits that the specification satisfies the requirements of Section 112, first paragraph. More specifically, Applicant respectfully submits that the specification as originally filed, including the Figures, would enable one skilled in the art to make and/or use the invention with only a modicum of study. However to expedite prosecution, Applicant has amended the figures, specification, and Claims as presented above. Accordingly, Applicant submits that Claim 1 satisfies the requirements of Section 112, first paragraph.

Claims 2-6 depend from independent Claim 1, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 1.

Claim 7 also includes the terms “single equivalent profile curve” and “revolved face.” Applicant respectfully submits that given the new Figures 4-7 and the respective specification description amendments, would enable one skilled in the art to make and/or use the invention with only a modicum of study. Accordingly, Applicant submits that Claim 7 satisfies the requirements of Section 112, first paragraph.

Claims 8-13 depend from independent Claim 7, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 7.

Applicant respectfully submits that the specification satisfies the requirements of Section 112, first paragraph. More specifically, Applicant respectfully submits that the disclosure, including the Figures, would enable one skilled in the art to make and/or use the invention with only a modicum of study. Furthermore, Applicant submits that the specification as originally filed, adequately describes a server system configured to be coupled to a client system and a data storage device, wherein the server system is also configured to generate a single equivalent curve for each revolved face of a three-dimensional solid in a two-dimensional plane. More specifically, Applicant submits that one skilled in the art, after reading the specification in light of the Figures would understand that a server system configured to be coupled to a client system may operate in a client-server environment that is outside of the limited definition provided in the Office Action, and as such, the server system may provide significantly greater resources than recited in the Office Action.

Furthermore, Applicant submits that a definition for “server” may not necessarily apply to a “server system” as claimed in the present specification. Similarly, Applicant submits that a definition of “configuration” may have little or nothing to do with the definition of “configured to” as recited in the Claims of the instant specification. A computer that is “configured to” perform a step of a process may be coupled within the entire interconnected set of hardware. As such, Applicant respectfully submits that using definitions of words other than those used in the Claims may have lead to a misunderstanding of the Claim recitations.

As such, Applicant respectfully submits that an artisan of ordinary skill in the art would recognize that the server system may be configured to not only execute administrative software that controls access to the network and its resources, but also may be programmed to execute application software and/or to support a client system with resources. Accordingly, Applicant submits that Claim 14 satisfies the requirements of Section 112, first paragraph.

Claims 15-20 depend from independent Claim 14, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 14.

For at least the reasons set forth above, Applicant respectfully requests that the Section 112, first paragraph, rejection of Claims 1-20 be withdrawn.

The rejection of Claims 1-20 under 35 U.S.C. §112, second paragraph, is respectfully traversed.

Applicant respectfully submits that Claims 1-20 satisfy Section 112, second paragraph. More specifically, Applicant respectfully submits that Claims 1-20 distinctly claim the subject matter of the invention. However to expedite prosecution, Applicant has amended the figures, specification, and claims as presented above. Accordingly, Applicant submits that Claim 1 satisfies the requirements of Section 112, second paragraph.

Claims 2-6 depend from independent Claim 1, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 1.

Claim 7 also includes the terms “single equivalent profile curve” and “revolved face.” Applicant respectfully submits that given the new Figures 4-7 and the respective specification description amendments, Claim 7 is definite and particularly points out and distinctly claims the subject matter of the invention. Accordingly, Applicant submits that Claim 7 satisfies the requirements of Section 112, second paragraph.

Claims 8-13 depend from independent Claim 7, and these dependent Claims are submitted to satisfy the requirements of Section 112 for the same reasons set forth above with respect to independent Claim 7.

Applicant submits that the specification as originally filed, adequately describes a server system configured to be coupled to a client system and a data storage device wherein the server system is further configured to generate a single equivalent curve for each revolved face of a three-dimensional solid in a two-dimensional plane. More specifically, Applicant submits that one skilled in the art, after reading the specification in light of the Figures would understand that a server system configured to be coupled to a client system may operate in a client-server environment that is not limited to the definition provided in the Office Action, but rather a server system may provide significantly greater resources than recited in the Office Action, such as executing application software in a client-server arrangement. Furthermore, Applicant submits that a definition for “server” may not necessarily apply to a “server system” as claimed in the present specification. Similarly, applicant submits that a definition of “configuration” may have little or nothing to do with a definition of “configured to” as recited in the Claims of the instant specification. A computer that is “configured to” perform a step of a process may be very much part of the entire interconnected set of hardware. As such, Applicant respectfully submits that using definitions of words other than those used in the Claims has lead to a misunderstanding of what is claimed.

Applicant submits that one of ordinary skill in the art would understand that a system used to create a two-dimensional representation of a three-dimensional solid, including a client system having a browser, a data storage device for storing information relevant to a plurality of users, and a server system configured to be coupled to the client system and the data storage device, may be configured such that the server system may generate a single equivalent curve for each revolved face of the three-dimensional solid in a two-dimensional plane. As such, Applicant respectfully submits that an artisan of ordinary skill in the art would recognize that the server system may be configured to not only execute administrative

software that controls access to the network and its resources but, may also execute application software that is controlled from a client system. Moreover, Claims 14-20 have been amended to remove reference to “configured to.” It is therefore submitted that Claims 14-20 clearly and distinctly claim the subject matter of the present invention. Accordingly, Applicant respectfully requests that the rejection of Claim 14 under Section 112, second paragraph be withdrawn.

Claims 15-20 depend from independent Claim 14. When the recitations of Claims 15-20 are considered with the recitations of Claim 14, Applicant respectfully submits that Claims 15-20 also meet the requirements of Section 112, second paragraph.

For at least the reasons set forth above, Applicant respectfully requests that the Section 112, second paragraph, rejection of Claims 1-20 be withdrawn.

Applicant respectfully traverses the assertion in the Office Action that Claims 14-20 are “so indefinite that no prior art examination is feasible.” For example, Applicant respectfully submits that Claims 14-20, as amended, meet the requirements of 35 U.S.C 112, first paragraph, written description, 35 U.S.C 112, first paragraph, enablement, and 35 U.S.C 112, second paragraph.

The rejection of Claims 1-13 under 35 U.S.C. §102 as being anticipated by Solid Edge is respectfully traversed.

Solid Edge describes a computer-aided design (CAD) system for mechanical assembly, part modeling, and drawing production that captures solid model design intentions through inference logic and decision-making concepts.

Claim 1 recites a method for creating a two-dimensional representation of a revolved three-dimensional solid wherein the method includes “selecting the three-dimensional solid for which the associative two-dimensional section is to be generated...inputting a computer aided drafting (CAD) compatible representation of the selected three-dimensional solid using an input device...generating a single equivalent profile curve for each revolved face of the three-dimensional solid in a two-dimensional plane...outputting the profile curve using an output device.”

Solid Edge does not describe nor suggest a method for creating a two-dimensional representation of a revolved three-dimensional solid wherein the method includes “selecting the three-dimensional solid for which the associative two-dimensional section is to be generated, inputting a computer aided drafting (CAD) compatible representation of the selected three-dimensional solid using an input device, generating a single equivalent profile curve for each revolved face of the three-dimensional solid in a two-dimensional plane, and outputting the profile curve using an output device. Rather in contrast to the present invention, Solid Edge describes using profile-based features to define the shape of materials. For example, on page 35, Solid Edge illustrates extruding a profile along a linear path, revolving the same 2D profile about an axis, and sweeping a profile along a user-defined path, to create a 3D shape. As such, Solid Edge describes creating simple 3D shapes from a 2D profile, and more specifically, describes a process that is, in a sense, opposite from the Claims of the present invention. For example, Claim 1 describes a method for creating a two-dimensional representation of a revolved three-dimensional solid, and in contrast, Solid Edge describes creating a three-dimensional shape from a two-dimensional profile. Furthermore, at page 51 lines 1-23, Solid Edge describes drawing 2D profiles on a plane, and inputting 2D shapes into a profile window, but Solid Edge does not describe creating a two-dimensional representation of a revolved three-dimensional solid. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Solid Edge

Claims 2-6 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-6 are considered in combination with the recitations of Claim 1, Applicant submits that Claims 2-6 are likewise patentable over Solid Edge

Claim 7 recites an apparatus for generating a two-dimensional representation of a three-dimensional solid wherein the apparatus includes a processor programmed to “receive a computer aided drafting (CAD) compatible representation of the selected three-dimensional solid from an input device...generate a single equivalent profile curve for each revolved face in a two-dimensional plane...output the two-dimensional representation based on the single equivalent profile curve to an output device.”

Solid Edge does not describe nor suggest an apparatus for generating a two-dimensional representation of a three-dimensional solid wherein the apparatus includes a processor programmed to receive a computer aided drafting (CAD) compatible representation of the selected three-dimensional solid from an input device, generate a single equivalent

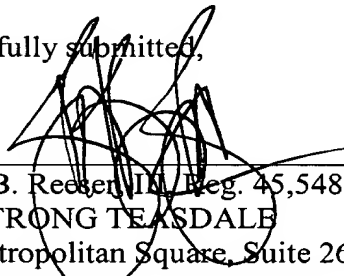
profile curve for each revolved face in a two-dimensional plane, and output the two-dimensional representation based on the single equivalent profile curve to an output device. Specifically, Solid Edge does not describe nor suggest a processor programmed to generate a single equivalent profile curve for each revolved face in a two-dimensional plane, Rather in contrast to the present invention, Solid Edge describes extruding a profile along a linear path, revolving the profile about an axis, and sweeping the profile along a user-defined path, to create a 3D shape. Accordingly, for at least the reasons set forth above, Claim 7 is submitted to be patentable over Solid Edge

Claims 8-13 depend, directly or indirectly, from independent Claim 7. When the recitations of Claims 8-13 are considered in combination with the recitations of Claim 7, Applicant submits that Claims 8-13 are likewise patentable over Solid Edge

Accordingly, for the reasons set forth above, Applicant requests that the Section 102 rejection of Claims 1-13 be withdrawn.

In view of the foregoing remarks, all the Claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully submitted,



Robert B. Reeder III, Reg. 45,548
ARMSTRONG TEASDALE
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070